

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC AND AUSTIN STORMS

Plaintiffs,

V.

C.A. No. 21-534-MN

LANCIUM LLC, MICHAEL T.

MCNAMARA, and RAYMOND E. CLINE, JR.

Defendants.

**DEFENDANTS' MOTION TO SEAL  
THEIR ANSWER AND COUNTERCLAIMS AND CERTAIN EXHIBITS THERTO**

Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline Jr., (“Defendants”) by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 5.2 and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, respectfully move for an Order permitting the filing under seal of Exhibits C-D (“Exhibits”) attached to the Answer to Complaint and Counterclaims, and portions of those Exhibits referenced in the Answer and Counterclaims.

The Exhibits include text messages and an email with attachments from Plaintiff Austin Storms to Defendant Michael McNamara. Lancium and Mr. McNamara do not believe any of the information in the Exhibits is confidential. When Defendants’ counsel reached out to Plaintiffs’ counsel about whether they agreed, however, Plaintiffs’ counsel requested that Defendants “please go ahead and file under seal” “[o]ut of an abundance of caution.” *See* email message attached as Exhibit A.

Defendants file this motion consistent with Plaintiffs' request.

Dated: May 3, 2021

BARNES & THORNBURG LLP

/s/ Chad S.C. Stover

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